

AFFIDAVIT

I, Christopher Brown, being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I submit this affidavit to establish probable cause to believe that on October 23, 2019, Elijah WHEELER-WATSON and Adis DJOZO violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B), and 18 U.S.C. § 2, by knowingly and intentionally possessing with the intent to distribute heroin, a Schedule I controlled substance, and 28 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance, and aiding and abetting the same.

2. I am a Special Agent (SA) with the Drug Enforcement Administration (DEA).

3. I am assigned to the DEA's Burlington Resident Office (BRO). I was hired as a Special Agent with DEA in June 2019, and completed DEA Basic Agent Training Academy, located in Quantico, Virginia in October 2019. In connection with my duties and responsibilities as a Special Agent, I have received extensive training in the field of narcotics trafficking investigations, including but not limited to, conducting surveillance, smuggling, undercover operations, methods of packaging, utilizing confidential sources, executing arrest and search warrants. Prior to my employment with the DEA, I was a Vermont State Trooper for 7 years. During that time, I have made narcotic arrests and assisted in narcotics investigations.

4. The information contained in this affidavit is based upon my training, experience, and investigation, as well as information that has been conveyed to me by other law enforcement officers. The following is either known to me personally or has been related to me by persons having direct knowledge of the events described below, including other law enforcement officers involved in this investigation. Since this affidavit is being submitted for the limited purpose of

establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts which I believe are necessary to establish probable cause to believe that WHEELER-WATSON and DJOZO committed the offenses described above.

Probable Cause

5. On October 23, 2019, members of law enforcement established surveillance in the area of 380 Summer Street in St. Johnsbury, VT. Newport, Vermont Detective Aaron Lefebvre observed a Honda Accord arrive at 380 Summer Street and park in the rear parking lot. Det. Lefebvre observed two males exit the vehicle and enter the main door of the address.

6. Approximately twenty minutes later, Det Lefebvre observed both males return to the Honda Accord. Det. Lefebvre observed the passenger, a black male, holding a red bag.

7. Law enforcement continued to surveil the Honda Accord as it travelled westbound on U.S. Route 2 in Vermont. Vermont State Police Trooper Justin Thompson conducted a motor vehicle stop on the Honda Accord for a motor vehicle infraction.

8. DEA Special Agent (SA) Timothy Hoffmann and DEA Task Force Officer (TFO) Chris Matott assisted with the stop. TFO Matott conducted a pat down of the driver, identified as Adis DJOZO, at the rear of the vehicle. TFO Matott immediately recognized the contents of DJOZO's left pocket to be consistent with heroin as typically packaged in this area. TFO Matott removed the object from the pant pocket, and TFO Matott determined the package was approximately 100 bags of suspected heroin. The word "Avengers" was stamped on the bags of suspected heroin. SA Hoffmann conducted a field test of the suspected heroin, and the results were a presumptive positive for the presence of heroin/fentanyl.

9. SA Hoffmann then conducted a pat down of the passenger, identified as Elijah

WHEELER-WATSON. SA Hoffmann observed a bulge in the front of WHEELER-WATSON's coat. WHEELER-WATSON advised he had approximately \$2000.00 of U.S. currency in his possession. SA Hoffmann seized approximately \$2000.00 USC from WHEELER-WATSON.

10. Trooper Thompson's K9 unit then conducted a free air sniff of the exterior of the vehicle when the vehicle was empty of all occupants. The K9 had a positive alert on the vehicle. Trooper Thompson informed me, and I reviewed records showing that, Trooper Thompson's K9 was certified by the Vermont Criminal Justice Training Council Canine Certification Committee on December 5, 2018 to perform the duties of a Narcotics, Drug Detection Team.

11. SA Hoffmann and TFO Matott then conducted a search of the vehicle. On the front passenger side, where WHEELER-WATSON had been sitting, SA Hoffmann seized a red bag with a zipper that was on the floor. The red bag contained approximately 25 bags of suspected heroin and multiple knotted plastic baggies that each contained an off-white chunky substance, suspected to be cocaine base. The bags of suspected heroin were stamped with the word "Avengers." The suspected cocaine base weighed approximately 41.8 grams with packaging. SA Hoffmann conducted a field test on the suspected cocaine base, and the results were a presumptive positive for the presence of cocaine.

12. Law enforcement arrested both WHEELER-WATSON and DJOZO. I assisted with an interview of DJOZO. Prior to the interview, SA Hoffmann read DJOZO his *Miranda* rights, and DJOZO waived his rights. Among other statements, DJOZO advised that he received the approximately 100 bags of heroin in St. Johnsbury.

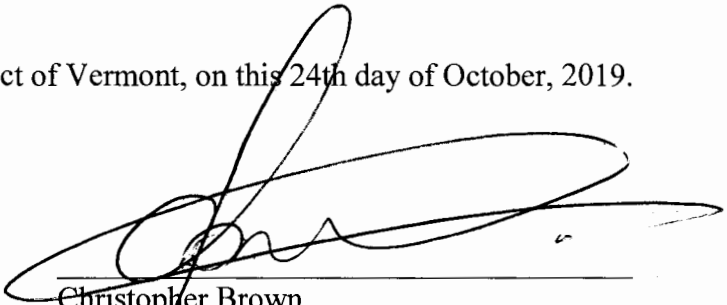
13. I also assisted with an interview of WHEELER-WATSON. Prior to the interview, SA Hoffmann read WHEELER-WATSON his *Miranda* rights, and WHEELER-WATSON waived his rights. Among other statements, WHEELER-WATSON admitted to

possessing a red “fanny pack.” WHEELER-WATSON also admitted that he put it under his seat and that he had money and “work,” which I know is a slang term for controlled substances.

Conclusion

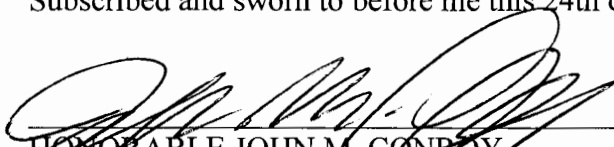
14. Based on the foregoing, I submit there is probable cause to believe that on October 23, 2019, Elijah WHEELER-WATSON and Adis DJOZO violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B), and 18 U.S.C. § 2, by knowingly and intentionally possessing with the intent to distribute heroin, a Schedule I controlled substance, and 28 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance, and aiding and abetting the same.

Dated at Burlington, in the District of Vermont, on this 24th day of October, 2019.



Christopher Brown
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me this 24th day of October, 2019.



HONORABLE JOHN M. CONROY
UNITED STATES MAGISTRATE JUDGE